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February 21, 2023

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend the following:

- Church activities related to his ordainment as a Young Men's Specialist for the LDS Lafayette Ward as approved by Pretrial Services in addition to the four church activities previously authorized by the Court (dkt. 270).
- The birthday parties of each of his two daughters at local venues. The time and location of each party shall be disclosed to and approved by Pretrial Services. Mr. Goettsche will be accompanied by a third-party custodian at each birthday party.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 225, 229, 251, 257, and 270). The Court previously denied a motion to modify bail conditions (dkt. 268).

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Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)